

From: David Godin
Sent: Tuesday, December 14, 2004 10:05 PM
To: NIEHS ICCVAM
Subject: Draize rabbit eye-irritation test

Dear Dr. William Stokes,

I am writing regarding the alternatives to the notorious Draize rabbit eye-irritation test. As alternative tests have been widely accepted in Europe since the mid 1990s for the purpose of identifying and classifying chemicals that cause severe eye irritation and as the ICCVAM has itself clarified the alternative tests as being valid, please do not perform "confirmatory" testing on animals. It is unnecessary and inhumane. Please enact the following regarding the ICCVAM's policy on animal experimentation: (a) background-review documents should clearly address the limitations of the current animal test for eye irritation, including its subjectivity, reproducibility, and its over- and under-prediction rate; (b) presumption to "validate" a non-animal method against an animal test that has never been properly validated itself should be prohibited; (b) take the time to learn that these tests are being used safely and effectively by the industry today; (c) act immediately to remove all obstacles to the acceptance and use of non-animal test methods in the U.S.

Thank you for your time.

Sincerely,

David Godin